

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Cynthia Cieri,

Debtor.

Case No.: 23-10034-pmm

Chapter 13

Related to ECF No. 51

**STIPULATION OF SETTLEMENT TO DEBTOR'S MOTION FOR SANCTIONS FOR  
VIOLATION OF THE AUTOMATIC STAY BY JPMORGAN CHASE BANK, N.A.**

**AND NOW**, on this \_\_\_\_ day of \_\_\_\_\_ 2024, Debtor Cynthia Cieri ("Debtor") and JPMorgan Chase Bank, N.A. ("Chase" and together, the "Parties"), by and through their undersigned counsel, hereby stipulate and agree that the Motion for Sanctions for Violation of the Automatic Stay and Praecipe to Re-List Motion for Sanctions for Violation of the Automatic Stay filed by Debtor against Chase on September 19, 2023 at ECF 51 and February 7, 2024 at ECF 59 (together, the "Motion"), including any claims and defenses that were or could have been raised in relation thereto, shall be and hereby are SETTLED as follows:

1. In consideration for the agreements set forth herein and as set forth more fully in the Confidential Settlement Agreement and Release (the "Agreement"), the Parties stipulate and agree to resolve the Motion in the matter set forth herein and in the Agreement.

2. Chase denies the allegations contained in Debtor's Motion;

3. Notwithstanding same, Chase agrees to remit funds to Debtor via Debtor's counsel within thirty (30) days of the entry of this stipulation in the amounts of \$3,000.00 (Three Thousand Dollars and Zero Cents).

4. Nothing herein or in the Agreement shall constitute or be construed as an admission by Chase of the truth of any of the allegations made or of any liability, fault, or

wrongdoing of any kind whatsoever.

5. Debtor acknowledges that Chase's fulfillment of the provisions of this stipulation fully resolves all damages and potential damages associated with the underlying matter.

6. The parties agree that this matter is hereby SETTLED.

**PARKER IBRAHIM & BERG LLP**  
*Counsel for Defendant,*

**CIBIK LAW, P.C.**  
*Counsel for Debtor,*

By: /s/ James P. Berg  
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Dated:

Dated:

**No Objection:**

By: /s/ LeeAne O. Huggins May 13, 2024  
LeeAne Huggins, Esq.  
Counsel for Kenneth E. West  
Chapter 13 Trustee  
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215-627-1377  
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**ORDER APPROVING STIPULATION**

AND NOW, on this \_\_\_\_\_ day of \_\_\_\_\_ 2024, it is ORDERED that this Stipulation of Settlement is APPROVED.

\_\_\_\_\_  
PATRICIA M. MAYER  
U.S. BANKRUPTCY JUDGE